

## Lorena Parada

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**From:** Liou, Jessica <jessica.liou@weil.com>  
**Sent:** Monday, October 3, 2022 9:44 AM  
**To:** Cicero, Gerard T.; Lorena Parada  
**Cc:** Will Abrams; dmolton\_brownrudnick.com; 'jtrotter@fvtadmin.com'; Karotkin, Stephen; Slack, Richard; Tsekerides, Theodore; Kissinger, William D. (william.kissinger@morganlewis.com); Amy Bach; Steven Skikos; Sieger-Grimm, Susan; Frank Pitre; Michael A. Kelly; scampora@dbbw.com; ecabraser@lchb.com; Amanda Riddle; Bill Robins; Gerald Singleton  
**Subject:** RE: Telephonic Conference Request: Case#19-30088(DM) Motions for Discovery

**CAUTION - EXTERNAL:**

Ms. Parada,

We are in receipt of Mr. Abrams' email to the Court dated October 2, 2022. Mr. Abrams' email seeks to have the Court force the Reorganized Debtors to meet and confer with respect to Mr. Abrams 2004 motion based on provisions of a Confidentiality and Protective Order dated August 7, 2019 [Dkt. No. 3405] issued by the Court.

We note that Mr. Abrams chose to file the 2004 motion seeking discovery against the Reorganized Debtors. Consistent with this Court's order dated June 10, 2021 [Dkt No. 10768], the parties were directed by your Honor to comply with the procedures established in that order. In addition, consistent with those procedures, this Court ordered any response of the Reorganized Debtors to Mr. Abram's 2004 motion be filed by the deadline established in the Court's order dated September 26, 2022 [Dkt. No. 13005].

Accordingly, the provisions of the Protective Order upon which Mr. Abrams bases his request do not apply here for those reasons, among others. In addition, Mr. Abrams' underlying 2004 motion against the Reorganized Debtors is wholly without merit and the Reorganized Debtors intend to respond to the motion on the schedule that the Court has issued. Discussions between the Reorganized Debtors and Mr. Abrams concerning his 2004 motion would not be fruitful under the circumstances here. Rather, the parties should follow the schedule and procedures set by the Court. We appreciate the Court's consideration of this matter.

Respectfully submitted,

**Weil**

Jessica Liou  
Partner  
Pronouns: She/her/hers

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